

**TECHNICAL REVIEW OF THE
PRE-FINAL (95%) REMEDIAL DESIGN
BASIS OF DESIGN REPORT**

**LCP CHEMICALS SUPERFUND SITE, OPERABLE UNIT 1
BRUNSWICK, GEORGIA**

1. Design Report Section 2.5.2 Soils and Infrastructure Removal describes the removal action conducted on the upland portion of the Site between 1994 and 1997 that included excavation of approx. 167,000 cubic yards (CY) of contaminated soil and industrial process. However, the 167,000 CY quantity includes the marsh removal are conducted in 1998. Either clarify the quantity or clarify the removal action changing the duration and other areas beyond the upland. Note that no further action remedial decision by USEPA is only for the upland.
2. In Appendix A Engineering Drawings, Sheet C14, Detail R/C11, complete Profile R-R'.
3. In Appendix B Technical Specifications, Section 35 02 00 Backfill and Thin Layer Cover, Part 3.4 Backfill Verification and in Appendix G Construction Quality Assurance Plan, Section 4.7.2 Thickness Verification, backfill is considered compliant only at min. 80% of the DMU meeting the target placement of 12 inches, a min. placement of 9 inches, and not contiguous areas greater than 500 sf less than 12 inches. What is the rationale for 80%?
4. In Appendix B Technical Specifications, Section 35 02 00 Backfill and Thin Layer Cover, Part 3.4 Backfill Verification and in Appendix G Construction Quality Assurance Plan, Section 4.8.2 Thickness Verification, placement is considered compliant only at min. 80% of the target placement of 6 inches, a min. placement of 4 inches, and no contiguous areas greater than 1,000 sf less than 6 inches. What is the rationale for 80%? This should be 100%. Appendix E Pilot Study Installation Section 4.5.2 Confirmation of Placement shows sample core thicknesses were over 6 inches. Further, the six-inch area thicknesses generally ranged from 7 to 8 inches. Procedures in the Pilot Study states that if the thickness of the cover material did not meet minimum thickness requirements, additional cover material was placed. This same procedure should be followed in the Remedial Action. Also, Appendix B Technical Specifications, Section 32 02 00, Part 3.6.E Thin Layer Cover Placement allows for 3 inches overplacement over the design minimum thickness of 6 inches.
5. Appendix B Technical Specifications, Section 35 00 23 Integrated Dredging, Part 3.10 Dredge Verification states that a min. of 95% of the post-dredge surveyed surface must be at or below the dredge design surface elevations for non-TSCA materials, whereas 100% of the post-dredge surveyed surface must be at or below the dredge design surface for TSCA materials. The 95% should be changed to 100%. The design allows for 6 inches overdredging; therefore, 100% should be achievable. Part 3.10B.2.b.ii and iii should be deleted from the Technical Specifications as well as the same provisions provided in Appendix G Construction Quality Assurance Plan, Section 4.6.1 Removal Verification.
6. In Appendix L Institutional Control Plan, Section 5 Conditions for Modification and Termination, the last paragraph states "Conditions for termination will occur if land ownership changes and/or the cleanup goals or levels are met." The ICs should follow the property regardless of the ownership.